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IN THE UNITED STATES DISTRICT COURT DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Case No. 2:21-mj-020879 DBP

Plaintiff,

SEALED COMPLAINT

VS.

ABBAS ALAZZAM,

Defendant.

Judge Dustin B. Pead

Before the Honorable Dustin B. Pead, United States Magistrate Judge for the District of Utah, appeared the undersigned, who on oath deposes and says:

COUNT I

21 U.S.C. § 841(a)(1)

(Possession of α -Pyrrolidinohexanophenone (α -PVP) with Intent to Distribute)

On or about November 10, 2021, in the District of Utah,

ABBAS ALAZZAM,

defendant herein, did knowingly and intentionally possess with intent to distribute

α-Pyrrolidinohexanophenone (α-PVP), a Schedule I controlled substance within the meaning of 21 U.S.C. § 812, all in violation of 21 U.S.C. § 841(a)(1) and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

This complaint is made on the basis of investigation consisting of the following:

- 1. In August of 2021, the DEA SLCDO was actively investigating a local organization for distributing illegal Synthetic Cathinones aka "bath salts" in the Salt Lake Valley, Utah area. During the course of the investigation, and utilizing federal wire intercepts agents identified the source of supply for bath salts for one of the primary local distributors. The source of supply, Abbas Alazzam, had been identified as a major source of supply for bath salts through cooperating defendants and information learned through intercepts of a co-conspirator's phone conversations.
- 2. On October 15, 2021, agents obtained an order to intercept the communications of telephone (801) 259-0843, which has been identified as the telephone used by Alazzam to contact direct members of his drug trafficking operation. Through the investigation, agents learned that Alazzam provides a local distributor with 30-60 grams of bath salts multiple times per week. Alazzam instructs that

distributor on the price to sell each gram of bath salt for (typically \$350-\$400 per gram), and then collects the proceeds once the bath salts are sold.

3. On November 10, 2021, DEA SLCDO agents conducted surveillance on Alazzam as calls were intercepted that he would be meeting with the distributor to give him something [Agents believed this meant Alazzam was going to retrieve money from the distributor. The distributor had previously been asking for more bath salts from **Alazzam**]. Agents observed the meeting, and observed the distributor give a bag [Agents believe it contained money] to Alazzam. The distributor left the area, and a short time later a black colored Mercedes SUV arrived at Alazzam's location. Agents observed Alazzam get into the Mercedes, and when he exited he was holding a dark colored back in his hand [Agents believe **Alazzam** just purchased a quantity of bath salts from his supplier]. got into a white Ford Explorer, registered to Abbas Alazzam, and left the area. Agents followed **Alazzam** as he was travelling towards the known address of the aforementioned distributor [Agents believe Alazzam was going to provide the distributor with a supply of bath salts to distribute]. When **Alazzam** was less than a block away from the distributor's residence, agents conducted a traffic stop on the vehicle driven by Alazzam, as it was believed he was transporting and was about to deliver bath salts.

- 4. At the time **Alazzam** was being stopped by police, he made a phone call to his brother and said he was being stopped. **Alazzam** told his brother, "I got pulled over by [the distributor's] house and I got shit with me, just in case I get locked up". The brother asked "what the fuck", then **Alazzam** said, "its in the car what the fuck".
- 5. Based on intercepted calls and surveillance agents believe that **Alazzam** had picked up bath salts and currently had those bath salts in the vehicle. Agents called a K-9 officer to the traffic stop of Alazzam and the K-9 alerted positively to the odor of drugs in the vehicle. Agents searched the vehicle and found a black backpack with a black plastic bag inside, which contained five similarly sized baggies of suspected bath salts [this bag was identified by surveillance as the bag believed to be in Alazzam's hands when he exited the Mercedes he had met just previous to this stop]. The total package weight of those bags was approximately 1057 grams, and the substance inside field-tested positive as α-Pyrrolidinohexanophenone (α-PVP), a Schedule I controlled substance. Agents also found another bag with smaller amounts of bath salts which had all been prepackaged in smaller bags. A small amount of cocaine was also located on the sun visor above the driver's seat. During a post arrest interview, Alazzam identified the substances as bath salts, but claimed they all belong to the distributor.

Alazzam claimed he was taking the bath salts to the distributor, and that he had received them from the male in the Mercedes SUV he had just met with.

Based on the foregoing information, I respectfully request that warrants of arrest be issued for **Abbas Alazzam** for violations of 21 U.S.C. §§841(a)(1).

Affiant, Paul Tittensor Task Force Officer, DEA

SUBSCRIBED AND SWORN to before me this 12th day of November, 2021.

Dustin B. Pead

Chief United States/Magistrate Judge

APPROVED:

ANDREA T. MARTINEZ

Acting United States Attorney

VERNON STEJSKAL

Assistant United States Attorney